

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

PETER LORA, VICTORIA BLOOM  
et al

V.

DEAN BOLAND

1:07 CV 2787

JUDGE DAN AARON POLSTER

MOTION TO SHOW CAUSE

Dean Boland respectfully moves this court to issue an order requiring Plaintiffs' to show cause why they should not be held in contempt of this court's directive, filed May 2, 2011, for the reasons contained in the attached memorandum.

/s/ Dean Boland

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MEMORANDUM

In the Minutes of Proceedings, filed by this court on May 2, 2011, the court directed the parties to address four legal issues. It did not permit either party to argue or re-argue any other matters.

Defendant timely filed his brief on the four legal issues. R. 98. Plaintiffs filed a “reply to response” on July 14, 2011. R. 100. Plaintiffs’ reply to response included a motion for summary judgment.

Plaintiffs’ conduct ignores this court’s directive and afforded Plaintiffs an additional opportunity to argue the summary judgment standard and all that entails. Defendant has not been afforded the same opportunity.

For these reasons, Defendant respectfully requests this court issue an order compelling Plaintiffs to show cause why they should not be held in contempt of court for failing to carefully adhere to merely briefing the four legal issues the court indicated on the record on May 2, 2011.

/s/ Dean Boland

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Proof of Service

A copy of the foregoing will be served on all parties this 24th of July 2011 by operation of the court's electronic filing system.

/s/Dean Boland  
Dean Boland